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Attorneys for Defendant

MATSON NAVIGATION COMPANY, INC.

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

BERT MEYER,

Plaintiff,

vs.

MATSON NAVIGATION COMPANY,
INC.,

Defendant.

CIVIL NO. 04-00049 HG/BMK
(In Admiralty)

DEFENDANT MATSON
NAVIGATION COMPANY, INC.'S
RESPONSE TO PLAINTIFF'S
INTERROGATORIES, SET NO.
ONE

DEFENDANT MATSON NAVIGATION COMPANY, INC.'S
RESPONSE TO PLAINTIFF'S INTERROGATORIES, SET NO. ONE

In accordance with Rule 33 of the Federal Rules of Civil Procedure,

Defendant MATSON NAVIGATION COMPANY, INC. ("Defendant"), by and

EXHIBIT "G"

3. Identify by name, home address, and home telephone number the captain of the S/S LIHUE on October 1, 2002?

Objection: Defendant objects on the grounds the request seeks information of a personal and confidential nature. Defendant objects to any attempt by Plaintiff to contact the captain at his home address and telephone number. Plaintiff is hereby placed on notice that all requests for information from the captain must be coordinated through this office.


RANDOLF L.M. BALDEMOR

Answer:

Thomas Stapleton

4. Identify by name, home address, and home telephone number of the chief mate of the S/S LIHUE on October 1, 2002.

Objection: Defendant objects on the grounds the request seeks information of a personal and confidential nature. Defendant objects to any attempt by Plaintiff to contact the chief mate at his home address and telephone number. Plaintiff is hereby placed on notice that all requests for information from the chief mate must be coordinated through this office.


RANDOLF L.M. BALDEMOR

Answer:

Eric Johnson

5. Identify by name, job title, employer, home address, and home telephone number of each animal tender who worked aboard the S/S LIHUE on October 1, 2002.

Objection: Defendant objects on the grounds that the request is vague and ambiguous as to "animal tender". Defendant also objects on the grounds the request seeks information of a personal and confidential nature.



RANDOLF L.M. BALDEMOR

Answer:

Greg Kinnell
41 Ridgecrest Road
Canyon, CA 94516

John Davis
3361 Mendocino Ave. #8
Santa Rosa, CA 95403
(707) 542-7470

Discovery is ongoing.

6. Identify by name, job title, home address and home telephone number each of your employees who investigated subject accident.

Objection: Defendant objects on the grounds that the request is vague and ambiguous as to "investigated". Defendant further objects on the grounds that the request seeks information of a personal and confidential nature.



RANDOLF L.M. BALDEMOR

Answer:

Discovery is ongoing.

- (e) the limits of coverage for each type of coverage contained in the policy;
- (f) whether any reservation of rights or controversy or coverage dispute exists between you and the insurance company;
- (g) the name, **ADDRESS**, and telephone number of the custodian of the policy.
- (h) The amount of any deductible or self insured retention.

Objection: Defendant objects on the grounds that the interrogatory is vague and ambiguous. Defendant further objects on the grounds that the interrogatory seeks information that is not relevant or likely to lead to the discovery of admissible evidence.

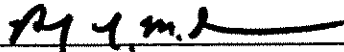


RANDOLF L.M. BALDEMOR

Answer:

Matson has P&I coverage in an amount sufficient to cover Plaintiff's claim as alleged in the complaint.

DATED: Honolulu, Hawaii, June 21, 2004.



JOHN R. LACY
RANDOLF L. M. BALDEMOR
Attorneys for Defendant
MATSON NAVIGATION CO., INC.

VERIFICATION

I, Barbara A. Bodager, declare:

I am an Assistant General Counsel of Matson Navigation Company, Inc. a corporation organized and existing under the laws of Hawaii, which is the Defendant in the above-entitled action, and I have been authorized to make this verification on its behalf.

I have read the foregoing DEFENDANT MATSON NAVIGATION COMPANY, INC.'S RESPONSE TO PLAINTIFF'S INTERROGATORIES, SET NO. ONE on file herein and know the contents thereof. The same is true of my own knowledge, except as to those matters which are therein stated on information and belief, and, as to those matters, I believe them to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed at Oakland, California on June 21, 2004.


Barbara A. Bodager

Law Department of
MATSON NAVIGATION COMPANY, INC.

VERIFICATION

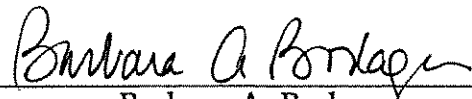
I, Barbara A. Bodager, declare:

I am an Assistant General Counsel of Matson Navigation Company, Inc. a corporation organized and existing under the laws of Hawaii, which is the Defendant in the above-entitled action, and I have been authorized to make this verification on its behalf.

I have read the foregoing DEFENDANT MATSON NAVIGATION COMPANY, INC.'S RESPONSE TO PLAINTIFF'S REQUEST FOR PRODUCTION OF DOCUMENTS, SET NO. ONE on file herein and know the contents thereof. The same is true of my own knowledge, except as to those matters which are therein stated on information and belief, and, as to those matters, I believe them to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed at Oakland, California on June 21, 2004.


Barbara A. Bodager